

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

**IN RE:** : **BK. No. 14-18692**  
**Stephen S. Sharkey** :  
                  **Debtor**                 : **Chapter No. 13**  
                  :  
**Toyota Motor Credit Corporation** :  
                  **Movant**                 :  
                  :

**DEBTORS' ANSWER TO WELLS FARGO BANK, N.A.'S**  
**MOTION FOR RELIEF**

Debtor, Stephen Sharkey, by and through his attorneys, Jeanne Marie Cella and Associates, LLC, answer Toyota Motor Credit Company (“Movant’s”) Motion for Relief from the Automatic Stay and respectfully represent the following:

1.      Admitted.
2.      Admitted.
3.      Denied as stated. Strict proof required at trial.
4.      Denied as stated. Strict proof required at trial.
5.      Denied as stated. Strict proof required at trial.
6.      Denied. Strict proof required at trial.
7.      Admitted.
8.      Denied. Strict proof required at trial.
9.      Denied. Strict proof required at trial. Debtor and Movant are currently in negotiation regarding a settlement of post-petition arrearages.
10.     Denied. Strict proof required at trial.
11.     Not set forth as a statement of fact, no response not required.
12.     Denied as stated. Strict proof required at trial.

**WHEREFORE**, the debtors respectfully request that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay.

Respectfully Submitted,  
**Jeanne Marie Cella and Associates, LLC**

BY: /s/ Jeanne Marie Cella, Esq.  
Jeanne Marie Cella, Esq.  
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Dated: January 2, 2018

